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7 United States of America

8
IN THE UNITED STATES DISTRICT COURT
9
EASTERN DISTRICT OF CALIFORNIA

10
11 UNITED STATES OF AMERICA,
12 Plaintiff,
13 v.
14 ANTON ANDREYEVICH IAGOUNOV,
15 Defendants.

CASE NO. 2:24-CR-00101 DJC
UNITED STATES' FIRST AMENDED EXHIBIT
LIST
DATE: July 8, 2024
TIME: 8:30 a.m.
COURT: Hon. Daniel J. Calabretta

16
17 The United States, by and through its undersigned counsel, hereby submits the following list of
18 exhibits it intends to introduce in its case-in-chief. The government reserves the right to supplement or
19 modify this list with an amended list of exhibits, should the need arise.

<u>EX. NO.</u>	<u>DESCRIPTION</u>	<u>BATES RANGE</u> (“IAGOOUNOV_#”)	<u>IDENTIFIED</u>	<u>ADMITTED</u>
1	Photograph of Building 2, 1432 Melba Drive, South Lake Tahoe	00004083		
2	Photograph of stairs and front door, Unit 202, 1432 Melba Drive, South Lake Tahoe	00004076		
3	Photograph of handwritten notes	00002573 - 00002574		

1	4	Photograph of A. Iagounov's bedroom.	00003462		
2	5	Photograph of A. Iagounov's bedroom	00003466		
3	6	Photograph of case containing electronic equipment from A. Iagounov's bedroom	00003574		
4	7	Photograph of black canvas bag containing miscellaneous items.	00003580		
5	8	Photograph of contents of black canvas bag.	00003582		
6	9	Photograph of handwritten notes and mail	00003598		
7	10	Photograph of miscellaneous items, including NSA folder	00003610		
8	11	Photograph of laptop computers and other items	00003620		
9	12	Photograph of bag containing gas cannisters	00003624		
10	13	Photograph of certificate issued to Anton Iagounov	00003634		
11	14	Photograph of license plates and miscellaneous items	00003638		
12	15	Photograph of credentials holder containing FEMA student identification: Anton Iagounov	00003642		
13	16	Photographs of U.S. Dept. of Homeland Security "Officer" badge holder, containing State of Nevada Private Investigators License Board Identification: Anton Iagounov	00002534 - 00002535, 00002537		
14	17	Photographs of U.S. Passport: Anton Iagounov	00002502, 00002505		

1	18	Photograph of FBI badge and miscellaneous items	00003644		
2	19	Photograph of plastic container holding ammunition and miscellaneous items	00003654		
3	20	Photograph of handwritten notes and business card	00003658		
4	21	Photograph of Homeland Security Legal Division Handbook	00003682		
5	22	Photograph of box containing FBI badge and U.S. Dept. of Homeland Security "Officer" credentials wallet	00003690		
6	23	Passport Renewal Application: Anton Iagounov	00002628		
7	24	Photograph of Visa credit card: Anton Iagounov	00003700		
8	25	Photograph of "Registered Executive Bodyguard" badge	00003714		
9	26	Photograph of plastic box containing body-worn camera and miscellaneous items	00003718		
10	27	FBI Receipt for Property, from 10/27/2022 search of Unit 202, 1432 Melba Ave., South Lake Tahoe, California	00002831 - 00002833		
11	28	GoDaddy.com business records for domain <u>usoig.us</u> (Shopper ID 28377725; Anton Iagounov)	00000389; 00000898 – 00000902		
12	29	FaxZero records for sender email <u>alvin.ch@proton.me</u>	00004111 – 0004124		
13	30	FaxZero records for sender email <u>usmcman_00@proton.me</u>	00004131 – 00004159		

1	31	FaxZero records for sender email ylbpkmwxomsg@arxxwalls.com	00004125 – 00004130		
2	32	FaxZero records for sender email yjofwviq@candassociates.com	00004160 – 00004165		
3	33	May 6, 2022 eFOIA Request received by FBI from “Carson City Sheriff’s Office”	00006014 – 00006016		
4	34	May 6, 2022 eFOIA Request PDF file from “Carson City Sheriff’s Office” (retrieved by search of Iagounov’s computer) f/n: foia_fbi_furlong.pdf	00006017 – 00006019		
5	35	May 11, 2022 email thread Re: “FOIA 1544822-0”	00006008 – 00006009		
6	36	May 18, 2022 email thread Re “Records Request from Carson City Sheriff”	00006010 – 00006013		
7	37	July 24, 2022 email re: “FW: Re: Russian threat of asynchronous terrorist-attacks domestically”	00004900 – 0004905		
8	38	Missing Person’s report pertaining to Anton Iagounov, filed October 28, 2022	00004728 – 00004733		
9	39	Affidavit for Criminal Complaint, <i>United States v. Alexander Yuk Ching Ma</i> , Case No. 1:20-mj-01016-DKW-RT (Aug. 13, 2020, D. Hi.); ECF No. 1 (incl. forensic report)	00005409 – 00005437		
10	40	Draft of search warrant affidavit: 06/19/2022 (incl. forensic report) f/n: electronic-device-search-warrant.pdf	00005473 – 00005503		
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1	41	Image of signature: "Joel Q. O'Neill" (incl. forensic report)	0005671 – 00005675		
2	42	Draft of search warrant affidavit: 06/27/2022 (incl. forensic report) f/n: Electronic Device Search Warrant.pdf	00005438 – 00005472		
3	43	Text file (incl. forensic report) f/n: hughes.txt	00005612 – 00005641		
4	44	Forensic Examination Reports of Web Browser Activity and Searches: June – August 2022	00005909 – 00005997 (Select pages)		
5	45	Forensic Examination Reports of Searches and Login Activity related to "Proton Mail" website	00006001 – 00006007		
6	46	Computer Forensic Examination Report for Item #1B63 (Lenovo Laptop Computer)	00003298		
7	47	Stipulation of Testimony of Trial Witness: Alvin Chang	ECF No. 25		
8	48	Stipulation of Testimony of Trial Witness: Hon. Beryl Howell	ECF No. 26		
9	49	Lenovo Laptop Computer, s/n: MP18EAS7 (Item #1B63)	n/a		
10	50	RESERVED			
11	51	Audio clip of Interview of A. Iagounov, 10/27/2022	00006108		
12	51A	Transcript of audio clip of Interview of A. Iagounov, 10/27/2022	00006129 – 00006130		
13	52	Audio clip of Interview of A. Iagounov, 10/27/2022	00006109		

1	52A	Transcript of audio clip of Interview of A. Iagounov, 10/27/2022	00006131 – 00006132		
2	53	Audio clip of Interview of A. Iagounov, 10/27/2022	00006110		
3	53A	Transcript of audio clip of Interview of A. Iagounov, 10/27/2022	00006133		
4	54	Audio clip of Interview of A. Iagounov, 10/27/2022	00006111		
5	54A	Transcript of audio clip of Interview of A. Iagounov, 10/27/2022	00006314 – 00006135		
6	55	Audio clip of Interview of A. Iagounov, 10/27/2022	00006112		
7	55A	Transcript of audio clip of Interview of A. Iagounov, 10/27/2022	00006136		
8	56	Audio clip of Interview of A. Iagounov, 10/27/2022	00006113		
9	56A	Transcript of audio clip of Interview of A. Iagounov, 10/27/2022	00006137 – 00006140		
10	57	Audio clip of Interview of A. Iagounov, 10/27/2022	00006114		
11	57A	Transcript of audio clip of Interview of A. Iagounov, 10/27/2022	00006141		
12	58	Audio clip of Interview of A. Iagounov, 10/27/2022	00006115		
13	58A	Transcript of audio clip of Interview of A. Iagounov, 10/27/2022	00006142		
14	59	Audio clip of Interview of A. Iagounov, 10/27/2022	00006116		

1	59A	Transcript of audio clip of Interview of A. Iagounov, 10/27/2022	00006143		
2	60	Audio clip of Interview of A. Iagounov, 10/27/2022	00006117		
3	60A	Transcript of audio clip of Interview of A. Iagounov, 10/27/2022	00006144		
4	61	Audio clip of Interview of A. Iagounov, 10/27/2022	00006118		
5	61A	Transcript of audio clip of Interview of A. Iagounov, 10/27/2022	00006145 - 00006146		
6	100	July 6, 2022 thread “Re: leaked DC court document,” search warrant affidavit attached Att. f/n: 20220704.pdf	00001838 – 00001879		
7	101	United States Capitol Police contact information (from USCP website)	00005193 – 00005194		
8	102	Image of signature: “Beryl Howell” (incl. forensic report) f/n: image3.png	00005648 – 00005652		
9	103	Draft search warrant affidavit (DDC): 07/04/2022 (incl. forensic report) f/n: Search_Warrant_DC.pdf	00005724 – 00005768		
10	104	Draft search warrant affidavit (DDC): 07/04/2022 (incl. forensic report) f/n: Search_Warrant_DC_ unsigned.pdf	00005769 – 00005812		

1 2 3 4	105 Draft search warrant affidavit (DDC): 07/04/2022 (incl. forensic report) f/n: 20220704.pdf	00006064 – 00006107		
5 6 7	106 Website (printed) of “The Guardian US editorial team” (incl. forensic report) f/n: guardian_contacts.pdf	00005595 – 00005611		
8 9 10 11	107 Text of online tip, including contact information for “Alvin Chang” and text of tip (incl. forensic report) f/n: dc_police.odt	00005401 – 00005406		
12 13 14 15	200 July 11, 2022 email thread from <u>service-processing@usoig.us</u> , “Re: emergency filing/#KYUSA0300,” with search warrant affidavit attached Att. f/n: 20220711.pdf	00000144 – 00000188		
16 17 18	201 Draft search warrant affidavit (CDCA): 07/11/2022 (incl. forensic report) f/n: 20220711.pdf	00005357 – 00005400		
19 20 21 22	300 July 21, 2022 email thread from <u>service-processing@usoig.us</u> , “FW: Re: #KYUSA0300,” with search warrant affidavit attached Att. f/n: Search Warrant_GA_unsigned.pdf	00001695 – 00001739		
23 24 25 26 27 28	301 Draft search warrant affidavit (MDGA): 07/21/2022 (incl. forensic report) f/n: Search Warrant_GA_ unsigned.pdf	00005853 – 00005896		

1 2 3 4 5	400 July 26, 2022 email thread from NIPTfaxe@ao.uscourts.gov , Re: "Fax Received from CSID: FaxZero.com," with 4-page electronic facsimile from "Timothy Metz, NASA-OIG," attached	00006127, 00006128, 00006120 – 00006123		
6 7 8 9	401 July 15, 2022 email thread from service-processing@usoig.us , "FW: #KYUSA0300," with search warrant affidavit attached Att. f/n: 07152022.pdf	00005195 – 00005238		
10 11 12	402 Draft search warrant affidavit (NDFL): 07/15/2022 (incl. forensic report) f/n: 07152022.pdf	00006020 – 00006063		
13 14 15 16 17	403 Letter from "Bob O.", Re: Russian threat of asynchronous terrorist attacks domescically," attached 2-page handwritten letter (incl. forensic report) f/n: russian_threat.pdf	00005717 – 00005723		
18 19 20	404 Notes, including letter from "Bob O., and drafts of letter re submission of search warrants (incl. forensic report) f/n: kaboom.odt	00005681 – 00005693		

Dated: July 5, 2024

PHILLIP A. TALBERT
United States AttorneyBy: /s/ JAMES R. CONOLLY
JAMES R. CONOLLY
Assistant United States Attorney